

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

VERIZON NEW ENGLAND, INC.,
Petitioner/Cross-Respondent,

v.

NATIONAL LABOR RELATIONS
BOARD,
Respondent/Cross-Petitioner,

INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS, LOCAL 2324,
AFL-CIO,
Intervenor.

Appeal Nos. 15-1062 & 15-1087

MOTION TO PARTICIPATE IN ORAL ARGUMENT

Now comes the International Brotherhood of Electrical Workers, Local 2324, AFL-CIO, the Intervenor in the above-captioned matter, and hereby moves to participate in the oral argument on April 11, 2016. As grounds for this motion, the Intervenor notes that the Court indicated in its *per curiam* order of March 29, 2016, [Docket No. 160612], that the Respondent's argument time would be "divided with intervenor as the parties see fit" and that counsel for the National Labor Relations Board has indicated that the Board agrees to cede five (5) minutes of oral argument time to the Intervenor. Counsel for the Petitioner has indicated that the Petitioner does not oppose the participation of the Intervenor.

WHEREFORE, for the foregoing reasons, the Intervenor respectfully requests that the Court allot it five (5) minutes from the Respondent's oral argument time.

Respectfully submitted,

/s/ Alfred Gordon O'Connell

Alfred Gordon O'Connell

Court of Appeals Bar No. 55950

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Date: March 31, 2016

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2016, copies of the foregoing Notice of Intent to Participate in Oral Argument were served on the following counsel of record through the CM/ECF system if they are registered users, or if they are not, by serving a true and correct copy by electronic mail and first class mail, postage prepaid, at the addresses listed below:

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/s/ Alfred Gordon O'Connell

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